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14 *Attorneys for Plaintiff*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 SIDNEY NAIMAN, individually
18 and on behalf of all others similarly
19 situated,

20 Plaintiff,

21 vs.

22 MCIHAEL MILLER INSURANCE
23 COMPANY; and DOES 1 through
24 10, inclusive, and each of them,

25 Defendant.

26 **Case No.: 4:21-cv-04883-DMR**

27 **JOINT STIPULATION FOR**
28 **CONTINUANCE OF INITIAL CASE**
1 **MANGEMENT CONFERENCE AND**
2 **DEFENDANT'S RESPONSIVE**
3 **PLEADING AND ORDER (AS**
4 **MODIFIED)**

5 **HON. DONNA M. RYU**

6 **DATE: SEPTEMBER 29, 2021**

7 **NEW DATE: DECEMBER 1, 2021**

8 **JOINT STIPULATION**

9 WHEREAS, the instant matter was filed on July 14, 2021 [Dkt. 1];

10 WHEREAS, on September 2, 2021, the Parties stipulated to extend
11 Defendant's time to respond to the Complaint to October 1, 2021 [Dkt. 7];

12 WHEREAS, the Court set an initial case management conference for
13 September 29, 2021, with a joint report due September 22, 2021 [Dkt. 5];

14 WHEREAS, as Defendant has just appeared in this action, the case is not at

1 issue such that the Parties request the case management conference be continued
2 by 63 days to provide time for the Parties to exchange information and meet and
3 confer about the matter;

4 WHEREAS, Defendant additionally wishes for a further extension of 30
5 days on its responsive pleading deadline while the Parties exchange information;

6 WHEREAS, good cause exists for such extension in the interests of judicial
7 economy and cost savings, as permitting the Parties to further explore an
8 exchange of information and engage in settlement discussions prior to incurring
9 the costs associated with the scheduling conference will facilitate such
10 discussions.

11 Thus, the parties jointly stipulate that:

12 The scheduling conference set for September 29, 2021 be vacated, and
13 continued to December 1, 2021, or a later date that is convenient to this Court and
14 the joint status report be due seven (7) days before the new date.

15 Defendant's responsive pleading deadline is extended to November 3, 2021.

16 **SO STIPULATED.**

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1 Dated: September 21st, 2021

Respectfully submitted,

2 By: s/Todd M. Friedman
3 Todd M. Friedman, Esq.
4 Attorney for Plaintiff

5 BY: s/ Michael J. Fish
6 Lisa Garcia, Esq.
7 Attorneys For Defendant

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained authorization to affix counsel for Defendant's electronic signature to this document.

Dated: September 21st, 2021

Respectfully submitted,

Law Offices of Todd M. Friedman, P.C.

By: s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiff

1 Filed electronically on this 21st Day of September, 2021, with:
2 United States District Court CM/ECF system.

3 Notification sent electronically on this 21st Day of September, 2021, to:

4 Honorable Donna M. Ryu
5 United States District Court
6 Northern District of California

7 And All Counsel of Record as Recorded On The Electronic Service List
8

9 /s/ Todd M. Friedman, Esq.

10 TODD M. FRIEDMAN
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SIDNEY NAIMAN, individually and on behalf of all others similarly situated,

Plaintiff,

VS.

MCIHAEL MILLER INSURANCE
COMPANY; and DOES 1 through
10, inclusive, and each of them,

Defendant.

Case No.: 4:21-cv-04883-DMR

**ORDER (AS MODIFIED)
GRANTING JOINT
STIPULATION FOR
CONTINUANCE OF INITIAL
CASE MANAGEMENT
CONFERENCE AND
DEFENDANT'S RESPONSIVE
PLEADING**

ORDER (AS MODIFIED)

Pursuant to the Stipulation of the Parties, and for GOOD CAUSE:

The initial case management conference set for September 29, 2021 is vacated and reset for December 1, 2021 at 10:00 a.m. by Zoom video conference.

The parties shall file their joint case management conference statement by November 24, 2021.

Defendant's responsive pleading shall be due by November 3, 2021.

IT IS SO ORDERED AS MODIFIED.

Dated: September 21, 2021